
1D. METROPOLITAN STATISTICAL AREA — COUNTY OF PUBLICATION:

Answer optional and not made.

1E. CITY AND RETAIL TRADING ZONES:

CITY ZONE is the corporate limits of Detroit, Grosse Pointe, Grosse Pointe Farms, Grosse Pointe Park, Grosse Pointe Shores (Part), Grosse Pointe Woods, Hamtramck, Harper Woods, Highland Park, Lincoln Park, River Rouge, and in Dearborn, 1990 Census Tracts 5735 through 5743, in Wayne County; in MACOMB County, balance of village of Grosse Pointe Shores; and in Oakland County, city of Ferndale, all in Michigan.

RETAIL TRADING ZONE includes, with exception of City Zone, the following area:

In Michigan - counties of Livingston, Macomb, Monroe, Oakland, Washtenaw and Wayne.

In Ontario, Canada - in ESSEX County, the area along the Detroit River five miles wide and eighteen miles long including city of Windsor, towns of Amherstburg and Tecumseh, and townships of Anderson and Sandwich West.

2. AVERAGE PAID CIRCULATION (BY INDIVIDUALS AND FOR DESIGNATED RECIPIENTS) IN NEWSPAPER DESIGNATED MARKET:

Answer optional and not made.

AUDIT STATEMENT

Due to a continuing newspaper strike which started July 13, 1995, the 1996 audit was limited to the three months ending March 31, 1996. No Publisher's Statements were filed for September 30, 1995 or March 31, 1996.

This newspaper also participates in the Audit Bureau of Circulations' Coupon Distribution Verification Service. A separate report of that verification is available to all ABC members who subscribe to this service. For more information, contact ABC.

PERCENTAGE OF TOTAL PAID AND HOUSEHOLD COVERAGE PERCENT:

	Occupied Households (1-1-95 Est.)	Combined Daily			Morning (Mon. to Fri.)			Evening (Mon. to Fri.)		
		Total Paid	% of Total Paid	Household Coverage	Total Paid	% of Total Paid	Household Coverage	Total Paid	% of Total Paid	Household Coverage
City Zone	445,100	120,529	20.90	27.08%	65,791	18.72	14.78%	54,738	24.30	12.30%
Retail Trading Zone	1,316,600	361,300	62.65	27.44%	218,143	62.07	16.57%	143,157	63.55	10.87%
Total City & Retail Trading Zones	1,761,700	481,829	83.55	27.35%	283,934	80.79	16.12%	197,895	87.85	11.23%
All Other		94,869	16.45		67,504	19.21		27,365	12.15	
TOTAL PAID		576,698	100.00%		351,438	100.00%		225,260	100.00%	

	Occupied Households (1-1-95 Est.)	Saturday & Holidays			Sunday		
		Total Paid	% of Total Paid	Household Coverage	Total Paid	% of Total Paid	Household Coverage
City Zone	445,100	116,231	20.87	26.11%	155,364	20.19	34.91%
Retail Trading Zone	1,316,600	360,476	64.71	27.38%	486,778	63.25	36.97%
Total City & Retail Trading Zones	1,761,700	476,707	85.58	27.06%	642,142	83.44	36.45%
All Other		80,335	14.42		127,452	16.56	
TOTAL PAID		557,042	100.00%		769,594	100.00%	



Audit Bureau of Circulations

PRINTED AND RELEASED
BY ABC JULY, 1996

AUDIT REPORT: 1995-1996

THE OAKLAND PRESS (Morning) THE SUNDAY OAKLAND PRESS

See Par. 9(a)

Pontiac (Oakland County), Michigan

TOTAL AVERAGE PAID CIRCULATION FOR 12 MONTHS ENDED MARCH 31, 1996:

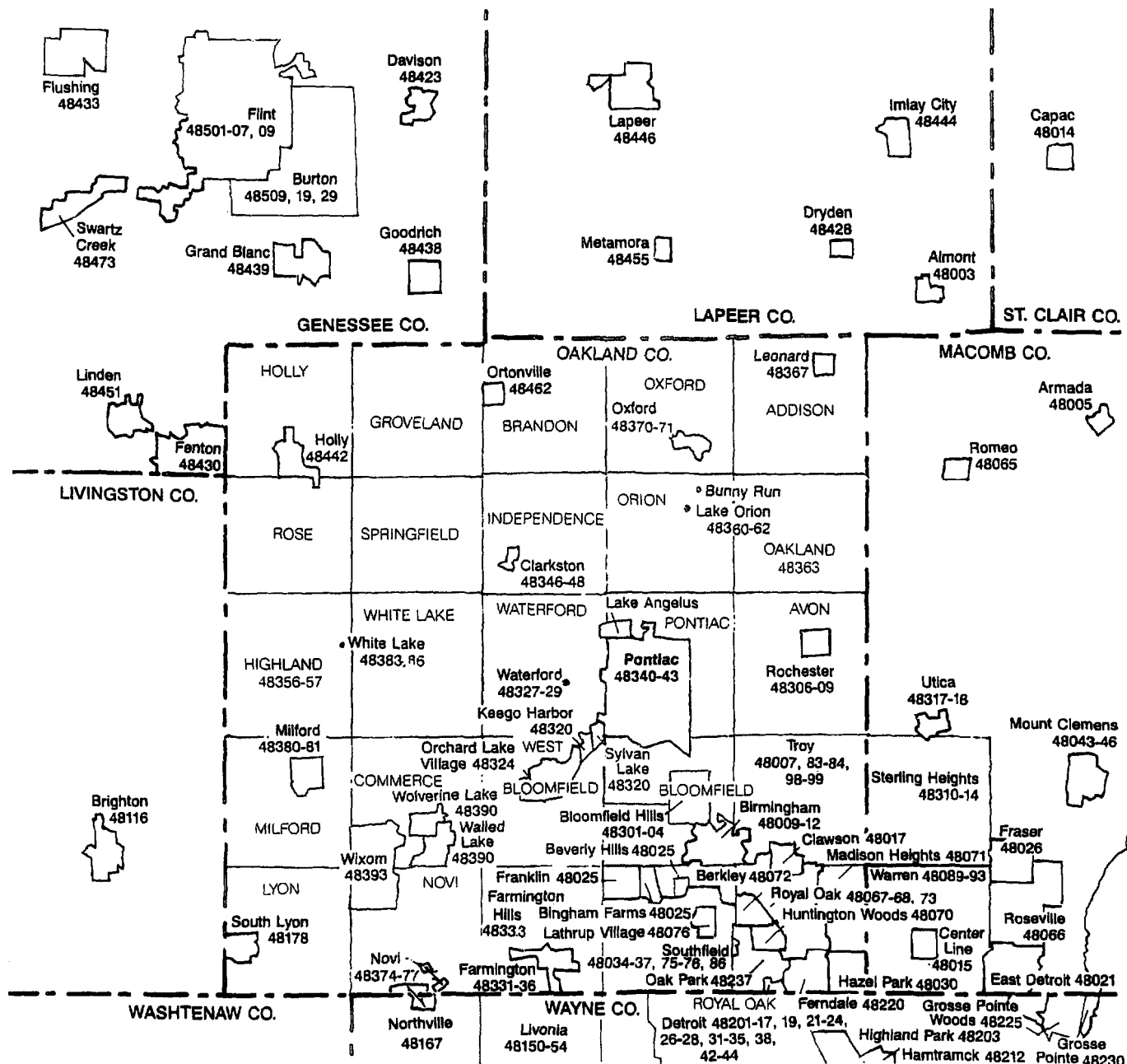
	Morning (Mon. to Sat.) (4-1-95 to 7-13-95)	Morning (Mon. to Sat.) (7-14-95 to 3-31-96)	Sunday (4-1-95 to 7-13-95)	Sunday (7-14-95 to 3-31-96)
1A. TOTAL AVERAGE PAID CIRCULATION (BY INDIVIDUALS AND FOR DESIGNATED RECIPIENTS):	72,306	85,145	80,681	99,945
1B. TOTAL AVERAGE PAID CIRCULATION (BY INDIVIDUALS AND FOR DESIGNATED RECIPIENTS) IN NEWSPAPER DESIGNATED MARKET: (See Par. 1E for description of area)				
NEWSPAPER DESIGNATED MARKET				
	Population	Occupied Households		
1990 Census:	523,775	188,761		
#1-1-95 Estimate:	546,100	197,700		
Home Delivery, See Par. 9(c)	55,327	58,496	62,185	67,345
Single Copy Sales	11,268	15,832	11,995	18,501
Mail Subscriptions	12	18	16	18
Newspapers in Education	317	634		2
Employee Copies	614	619	616	615
TOTAL NEWSPAPER DESIGNATED MARKET	67,538	75,599	74,812	86,481
CIRCULATION OUTSIDE NEWSPAPER DESIGNATED MARKET				
Home Delivery, See Par. 9(c)	3,023	4,103	3,628	4,846
Single Copy Sales	1,556	5,183	2,061	8,425
Mail Subscriptions	180	193	180	192
Newspapers in Education	9	66		
Employee Copies		1		1
TOTAL CIRCULATION OUTSIDE NEWSPAPER DESIGNATED MARKET	4,768	9,546	5,869	13,464
TOTAL AVERAGE PAID CIRCULATION (BY INDIVIDUALS AND FOR DESIGNATED RECIPIENTS)	72,306	85,145	80,681	99,945
Days Omitted from Averages, See Par. 9	4	None of record	None of record	None of record

1C. THIRD PARTY (BULK) SALES:

Restaurants — Available for patrons	26	33	24	24
TOTAL AVERAGE THIRD PARTY (BULK) SALES	26	33	24	24

#Market Statistics, Producers of "The Survey of Buying Power," See Par. 9(b).

NEWSPAPER DESIGNATED MARKET / PONTIAC, MICHIGAN



Audit Bureau of Circulations

Schaumburg, Illinois

C517-R93

1D. METROPOLITAN STATISTICAL AREA — COUNTY OF PUBLICATION:

Answer optional and not made.

1E. NEWSPAPER DESIGNATED MARKET:

NEWSPAPER DESIGNATED MARKET is comprised of the following area in OAKLAND County, Michigan: cities of Auburn Hills, Bloomfield Hills, Keego Harbor, Lake Angelus, Orchard Lake Village, Pontiac, Rochester, Rochester Hills, Sylvan Lake, Walled Lake and Wixom; plus townships of Addison, Brandon, Commerce, Groveland, Highland, Holly, Independence, Milford, Oakland Charter, Orion, Oxford, Rose, Springfield, Waterford, West Bloomfield, White Lake and Bloomfield less 1990 Census Tracts 1507, 1508, 1509 and 1510.

2. AVERAGE PAID CIRCULATION (BY INDIVIDUALS AND FOR DESIGNATED RECIPIENTS) IN NEWSPAPER DESIGNATED MARKET:

See Par. 1B.

AUDIT STATEMENT

There was no adjustment made in the average paid circulation as shown in the Publisher's Statements for the period audited.

PERCENTAGE OF TOTAL PAID AND HOUSEHOLD COVERAGE PERCENT:

	Occupied Households (1-1-95 Est.)	Total Paid	Morning (Mon. to Sat.) (4-1-95 to 7-13-95) % of Total Paid	Household Coverage	Total Paid	Morning (Mon. to Sat.) (7-14-95 to 3-31-96) % of Total Paid	Household Coverage
Newspaper Designated Market..	197,700	67,538	93.41	34.16%	75,599	88.79	38.24%
Outside Newspaper Designated Market.....		4,768	6.59		9,546	11.21	
TOTAL PAID		72,306	100.00%		85,145	100.00%	
	Occupied Households (1-1-95 Est.)	Total Paid	Sunday (4-1-95 to 7-13-95) % of Total Paid	Household Coverage	Total Paid	Sunday (7-14-95 to 3-31-96) % of Total Paid	Household Coverage
Newspaper Designated Market..	197,700	74,812	92.73	37.84%	86,481	86.53	43.74%
Outside Newspaper Designated Market.....		5,869	7.27		13,464	13.47	
TOTAL PAID		80,681	100.00%		99,945	100.00%	

70%

based on Fall 1993 targets

Radio Market Report

Detroit



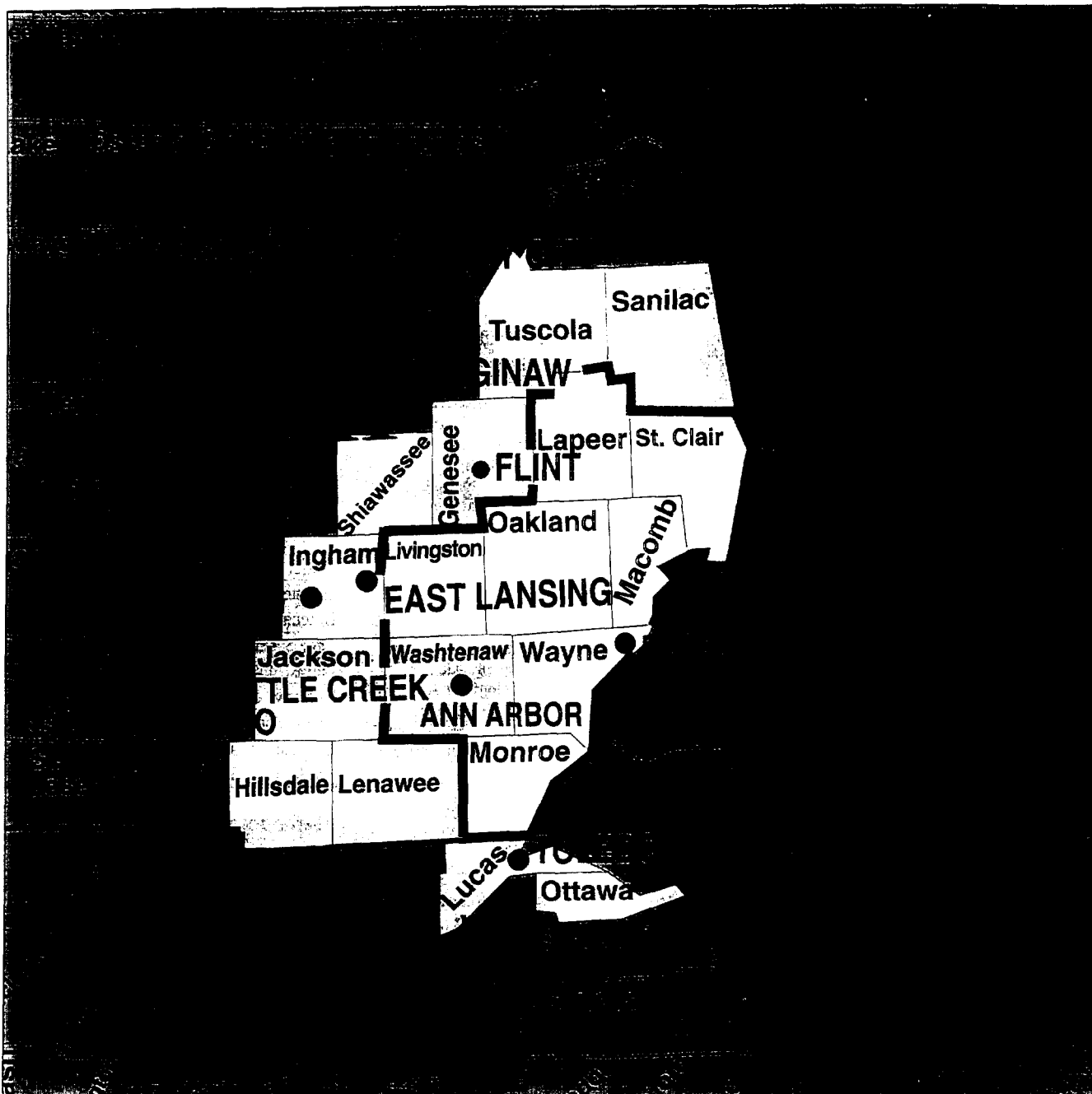
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Electronic Media
Rating Council®

26 Detroit
Summer 1996

ARBITRON

Summer 1996
June 27 - September 18

Detroit



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☐ Metro ☒ TSA ☒ DMA®

TSA and DMA sampled in Spring and Fall only.
For definitions of the terms Metro, TSA and DMA, see Page M3, Paragraph 1, and Page M7, "Selected Arbitron Terms."

Metro Rank: 6

Market Surveyed: Winter, Spring, Summer, Fall

Station Subscribers to This Report*

CIDR-FM	CIMX-FM	CKLW-AM	WCHB-AM	WCHB-FM	WCSX-FM
WDFN-AM	WDRQ-FM	WDZR-FM	WHYT-FM	WJLB-FM	WJR-AM
WKQI-FM	WMXD-FM	WNIC-FM	WOMC-FM	WRIF-FM	WWJ-AM
WWW-FM	WXYT-AM	WYCD-FM	WYST-FM		

* Station subscribers as of release to print.

ARBITRON

Description of Methodology

Introduction

The following Description of Methodology is applicable to the data and estimates contained in the "Listener Estimates" section of this report. A more detailed description of Arbitron methodology can be found in a separate publication titled *Arbitron Radio Description of Methodology* and in other associated relevant documents, made available by Arbitron to all Arbitron syndicated Radio Report subscribers. In the event that the separate publication titled *Arbitron Radio Description of Methodology* conflicts with the "Description of Methodology" printed herein, the latter is considered the more current Description of Methodology.

The Market

1. The Market/An Arbitron Radio Market can be composed of up to three geographic areas: the Metro Survey Area (Metro), the Total Survey Area (TSA) and the Designated Market Area (DMA®). These areas are composed of sampling units. A sampling unit generally consists of a single county, but may also consist of an independent city or a split county. Split counties are defined as one or more zip codes within a county and are based on zip code information from 1990 Census data, as updated annually by Market Statistics.

a. Metro Survey Area (Metro)

Arbitron Radio Metros generally correspond to the federal government's Office of Management and Budget's (OMB) Metropolitan Areas. A radio Metro may deviate from its respective OMB definition due to topographical, sampling, or other considerations.

For areas that do not have an OMB-defined Metropolitan Area, Arbitron usually defines the Metro Survey Area to include the county(ies) of the majority of the local area stations' city(ies) of license.

The OMB updates its Metropolitan Areas every 10 years, based on the new decennial census data. At that time, Arbitron reviews all Radio Metro definitions for possible adoption of the applicable OMB definitions. In the review process, Arbitron considers such factors as: the historical market definition(s), local trade and commuting patterns, local radio listening patterns, and input from its subscribers.

Changes to an existing Metro definition between the 10-year OMB review cycles will be considered by Arbitron if a formal written proposal, which presents in detail the rationale and benefits of the proposed Metro, is submitted to Arbitron within established deadlines; widespread subscriber support for the change is generally required as well.

b. Total Survey Area (TSA)

The TSA of an Arbitron Radio Market is designed to provide a comprehensive measure of listening to Metro-licensed radio stations. The TSA is composed of the Metro and any additional counties (or geographically split counties) which meet certain criteria for inclusion.

TSA definitions are based on historical radio listening patterns and are updated biennially based on the syndicated diary data used for the most recent County Coverage study [excluding any extra sample used for Custom Survey Area Reports (CSARs)]. The specific criteria for adding, retaining or deleting non-Metro TSA counties are outlined in a separate publication titled *Arbitron Radio Description of Methodology* and in other associated relevant documents.

c. Designated Market Area (DMA®)

The DMA is composed of sampling units (counties or geographically split counties) and is defined and updated annually by the A.C. Nielsen Company, based on historical television viewing patterns. A county or split county is assigned exclusively to one DMA.

Arbitron reports radio listening estimates for the Top 50 DMAs (ranked on TV households) in the Radio Market Reports of all Arbitron standard radio markets whose Metros are located within the DMA and whose names are contained in the DMA name.

Sampling & Measurement Techniques

2. Sampling Methodology/Survey sample targets are established for the Metro and, if applicable, the non-Metro TSA and/or the DMA. Sample targets are then established for each sampling unit proportional to its Persons 12+ population in the respective survey area subject to minimum sample requirements for Radio County Coverage. The amount of sample ordered is determined by dividing the sampling unit target by the expected rate of response based on previous survey(s) sample performance and other factors.

For each 12-week survey period, a new sample of telephone numbers is computer-selected for each sampling unit through the use of a systematic interval random selection technique. Listed and unlisted telephone numbers are randomly generated using the random digit dial (RDD) technique. Sample RDD numbers are generated from telephone "hundred blocks" containing at least 10 listed residential telephone numbers based on current telephone listings as provided and updated by Metromail Corporation. These qualifying hundred blocks comprise the sample frame for each sampling unit. Known non-residential telephone numbers (e.g., businesses, institutions) are excluded from the sample frame. The sample of telephone numbers is then randomly divided into approximately equal weekly groups for diary placement calling.

If a need for additional sample arises after the original sample has been selected by the computer, then such additional sample is generally selected in the same manner and from the same sample frame as the original sample.

3. Arbitron Radio Listening Diary/Arbitron uses 7-day individual diaries to gather listening information from persons 12 years of age and older (Persons 12+). Bilingual (Spanish-English) diaries are provided to all survey participants in the Metro of a Hispanic-controlled market who have identified themselves as Hispanic in response to an ethnicity question or from whom ethnic information was not obtained, and to any others indicating a preference for a bilingual diary. Premiums of varying monetary amounts are provided to encourage respondent cooperation. Arbitron sends a diary for each Person 12+ reported in the sample household up to a maximum of nine diaries.

4. Diary Placement and Retrieval/Initial contact with listed sample households is by mail, informing them of their selection and that an interviewer will be calling to request their cooperation in the survey. Initial contact with unlisted sample households is by telephone, when an interviewer calls to request participation in the survey.

Arbitron interviewers call selected telephone numbers to ascertain the possibility of a media affiliation, to gain consent for participation in the

survey, to determine the number of Persons 12+ living in the household at the time of the placement call and, where applicable, to determine the race/ethnicity and demographics of the household. Households with more than nine persons 12 years of age and older and media-affiliated households are ineligible for survey participation.

Interviewers are instructed to make a number of attempts to reach every telephone number in the sample. These attempts are made at different hours of the day and evening. Arbitron then sends diaries directly to consenting sample households.

In addition to follow-up by mail from Arbitron, the interviewers are directed to make further contact(s) with consenting sample households by telephone: to make sure the diaries have been received; to assist members of the household in understanding the diaries' purpose; to answer any questions; to remind the diarykeepers to return their diaries after the survey week; and to thank them for their participation in the survey.

Explicit instructions are provided to each interviewer, and validation checks are regularly conducted to help ensure that instructions are being properly followed.

Processing Techniques

5. Processing of Diaries/Arbitron makes reasonable efforts to utilize all returned diaries. However, some returned diaries are determined by Arbitron to be unusable. Among those which are unusable are diaries which Arbitron determines: are incomplete; are postmarked and/or arrive before or after established dates; or which otherwise lack essential information. The total number of in-tab diaries may differ from the sample target.

Usable diaries are prepared for computer processing in accordance with procedures listed in the *Arbitron Radio Edit Procedures Manual*. The listening information in the diaries is then computer-entered so that certain verifications and edits can be made. These include ascertainment procedures, the allocation of credit for aberrated call letters and other analyses and pretabulation preparations.

Calculating Techniques

6. Calculation of Estimates/

a. Sample Balancing

The weighting system used by Arbitron, sample balancing, is an iterative marginal weighting technique designed to compensate for disproportionate in-tab from specified marginal classes. Marginal weighting means that in-tab diaries are weighted to represent the population for each specified marginal class. The number of geographic marginal classes (i.e., counties, split counties or county clusters) will vary. The number of sex/age marginal classes is generally 16. In addition, markets that are race and/or ethnically controlled are sample balanced so that in-tab diaries from the race/ethnic group are weighted to represent the population of that race/ethnic group. As a result of this cumulative weighting, a Persons-Per-Diary Value (PPDV) is computed for each in-tab diary. The PPDV is the number of persons that diary is estimated to represent.

b. Computing Cumulative Persons Estimates

Station Cumulative Persons estimates are computed by summing the PPDVs for each diary in which a station received listening credit for the time the station is on the air within a daypart. PPDVs are

Selected Arbitron Terms

Average Quarter-Hour Persons/The estimated number of persons who listened to a station for a minimum of five minutes within a quarter-hour. The estimate is the average of the reported listening in the total number of quarter-hours the station was on the air during a reported daypart. This estimate, expressed in hundreds (00), is reported for the Metro, TSA and, where applicable, the DMA.

Average Quarter-Hour Rating/The Average Quarter-Hour Persons estimate expressed as a percentage of the appropriate estimated population. This estimate is reported for the Metro and, where applicable, the DMA.

Average Quarter-Hour Share/The Average Quarter-Hour Persons estimate for a given station expressed as a percentage of the Metro Total Average Quarter-Hour Persons estimate within a reported daypart. This estimate is reported for the Metro only.

Cume Duplication/The percentage of estimated Cume Persons for one station that also listened to a second station. This estimate is reported for the Metro only.

Cume Persons/The estimated number of different persons who listened to a station for a minimum of five minutes in a quarter-hour within a reported daypart. (Cume estimates may also be referred to as *cumulative* or *unduplicated* estimates.) This estimate, expressed in hundreds (00), is reported for the Metro, TSA and, where applicable, the DMA.

Cume Rating/The estimated number of Cume Persons expressed as a percentage of the appropriate estimated population. This estimate is reported for the Metro only.

Daypart/A time period for which audience estimates are reported (e.g., Monday-Friday, 6AM-10AM; Weekend 6AM-Midnight).

Designated Market Area (DMA)/A.C. Nielsen's geographic market design which defines each television market exclusive of others based on measurable viewing patterns. Every county or sampling unit in the United States is assigned exclusively to one DMA®.

Designated Sample/Telephone numbers selected from the sample frame for this survey determined by Arbitron to be usable.

Diary Mentions/The number of in-tab diaries in which listening to a station has been recorded for at least five minutes in a quarter-hour within a given daypart.

Diarykeeper/Any individual that Arbitron determines to be eligible to receive and who is sent survey materials.

Effective Sample Base (ESB)/The theoretical sample size to be used for estimating the sampling error of audience estimates. (See Page M5, Par. 15.)

Ethnic Composition/Audience estimates for Total, Black and/or Hispanic persons expressed in hundreds (00), ratings and composition percents. Ethnic composition estimates are based on total Metro in-tab diaries and are reported for the Metro of ethnically controlled markets only if at least 30 Black and/or 30 Hispanic diaries, as appropriate, are in-tab from the Metro.

Exclusive Cume Audience/The estimated number of Cume Persons who listened to only one selected station within a reported daypart. This estimate is shown for the Metro only.

Group Quarters/For sampling purposes, Arbitron defines group quarters as residences of 10 or more unrelated individuals. However, living arrangements such as college housing units, military barracks, nursing homes, etc., are considered eligible residences if the telephone number is assigned to a private telephone serving fewer than 10 individuals.

High-Density Area (HDA)/A High-Density Area is a zip code-defined sampling unit which may be established in a county within the Metro of an ethnically controlled market. The specific criteria for establishing, retaining, or eliminating an HDA are outlined in a separate publication titled *Arbitron Radio Description of Methodology*.

In-Tab Sample/The number of usable diaries tabulated in producing the report.

Listening Locations/Locations for which audience estimates are reported (At Home, In Car, At Work, Other).

Metro Survey Area (Metro)/Metro Survey Area definitions generally correspond to the federal government's Office of Management and Budget's (OMB) Metropolitan Statistical Areas, Primary Metropolitan Statistical Areas or Consolidated Metropolitan Statistical Areas, subject to exceptions dictated by historical industry usage or other marketing considerations as determined by Arbitron.

Metro Totals and/or DMA Totals (*Total listening in the Metro and/or Total listening in the DMA*) / The Metro and/or DMA Total estimates include estimates of listening to reported stations, as well as to commercial stations that did not meet the Minimum Reporting Standards, plus estimates of listening to noncommercial and unidentified stations.

Minimum Reporting Standards (MRS)/Criteria used to determine which stations qualify to be listed in this report. (See Page M4, Pars. 8-9.)

Persons-Per-Diary Value (PPDV)/The numerical value assigned to each in-tab diary for the process of projecting audience estimates to the entire 12+ population in a market. The PPDV reflects the number of persons in the geographic/sex/age/ethnic (if applicable) group represented by each in-tab diary after sample balancing has been performed.

Rating/(See Average Quarter-Hour Rating and Cume Rating.)

Sample Frame/The universe from which eligible diarykeepers are randomly selected. The sample frame for Arbitron radio surveys is designed to sample households with telephones.

Sample Target/The number of diaries that is the objective for in-tab sample size.

Sampling Unit/A geographic area consisting of a county or split county. (See Page M3, Par. 1.)

Share/(See Average Quarter-Hour Share.)

Simulcast/The simultaneous broadcast of one station's total and uninterrupted broadcast flow by a second station without any variation except if the two simulcast stations choose to separately identify their call letters, frequency, station name and/or city of license, if appropriate, at the same time.

Split County/A portion of a county composed of one or more zip codes which has been separately identified for purposes of ordering and controlling sample.

Technical Difficulty (TD)/Time period(s) of five or more consecutive minutes during the survey period for which a station listed in this report notified Arbitron in writing of: reduced power; intermittent power; signal interference; or times the station was off the air within the station's authorized broadcast day.

Time Spent Listening (TSL)/An estimate of the amount of time the average person spent listening to radio or to a station during a specific daypart expressed in hours and minutes. This estimate is reported for the Metro only.

Total Survey Area (TSA)/A geographic area that includes the Metro Survey Area and may include additional counties.



Audit Bureau of Circulations

PRINTED AND RELEASED
BY ABC NOVEMBER, 1996

AUDIT REPORT: THE DALLAS MORNING NEWS (Morning & Sunday) Dallas (Dallas County), Texas

TOTAL AVERAGE PAID CIRCULATION FOR 12 MONTHS ENDED MARCH 31, 1996:

	Morning (Mon. to Thurs.)	Friday Morning	Saturday Morning	Sunday
1A. TOTAL AVERAGE PAID CIRCULATION (BY INDIVIDUALS AND FOR DESIGNATED RECIPIENTS):	497,326	618,358	578,569	801,880

1B. TOTAL AVERAGE PAID CIRCULATION (BY INDIVIDUALS AND FOR DESIGNATED RECIPIENTS)

IN NEWSPAPER DESIGNATED MARKET:

(See Par. 1E for description of area)

CITY ZONE

	Population	Occupied Households		
1990 Census:	2,171,194	821,443		
#1-1-95 Estimate:	2,377,000	888,400		
Home Delivery.....				
Single Copy Sales				
Mail Subscriptions				
Newspapers in Education				
Employee Copies				
Group (Subscriptions by Businesses for Designated Employees)....				
TOTAL CITY ZONE, See Pars. 9(b), (c) & (d).....			342,768	433,654
			402,217	554,506

BALANCE IN NEWSPAPER DESIGNATED MARKET

	Population	Occupied Households		
1990 Census:	2,078,971	769,074		
#1-1-95 Estimate:	2,282,900	842,900		
Single Copy Sales and Home Delivery.....			90,928	114,218
Mail Subscriptions			234	236
Newspapers in Education			926	646
Group (Subscriptions by Businesses for Designated Employees), See Par. 9(d).....			174	175
TOTAL BALANCE IN NEWSPAPER DESIGNATED MARKET.....			92,262	115,275
			109,994	162,505

	Population	Occupied Households		
1990 Census:	4,250,165	1,590,517		
#1-1-95 Estimate:	4,659,900	1,731,300		
TOTAL NEWSPAPER DESIGNATED MARKET			435,030	548,929
			512,211	717,011

CIRCULATION OUTSIDE NEWSPAPER DESIGNATED MARKET

Single Copy Sales and Home Delivery.....	60,107	67,381	64,552	82,498
Mail Subscriptions	1,450	1,478	1,560	2,228
Newspapers in Education	583	413	114	12
Group (Subscriptions by Businesses for Designated Employees), See Par. 9(d).....	156	157	132	131

TOTAL CIRCULATION OUTSIDE NEWSPAPER DESIGNATED MARKET	62,296	69,429	66,358	84,869
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TOTAL AVERAGE PAID CIRCULATION (BY INDIVIDUALS AND FOR DESIGNATED RECIPIENTS).....	497,326	618,358	578,569	801,880
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Days Omitted from Averages, See Par. 9.....	1	None of record	None of record	1
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1C. THIRD PARTY (BULK) SALES:

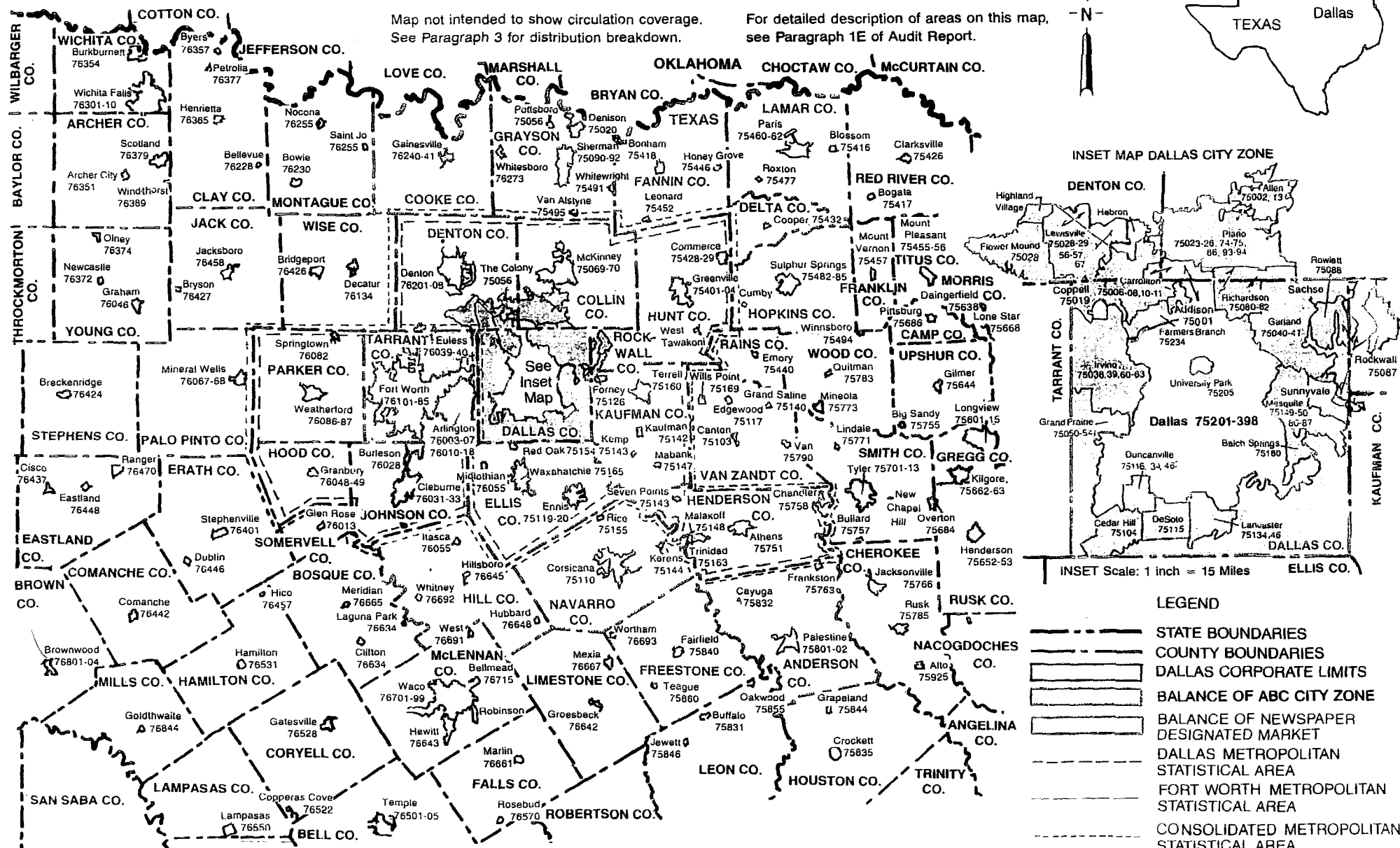
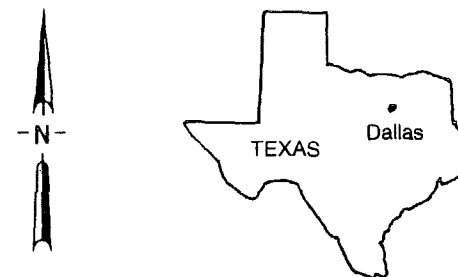
Clubs — Available for members.....	47	48	54	71
Hospitals and Nursing Homes — Available for patients.....	429	452	400	88
Hotels, Motels — Available for guests	612	685	1,905	1,524
Restaurants — Available for patrons	165	165	202	188
Retail/Business — Available for patrons				3
School Copies — From non-school funds provided directly to the newspaper.....	4	5		
TOTAL AVERAGE THIRD PARTY (BULK) SALES	1,257	1,355	2,561	1,874

#Market Statistics, Producers of "The Survey of Buying Power," See Par. 9(a).

CITY ZONE AND NEWSPAPER DESIGNATED MARKET / DALLAS, TEXAS

Map not intended to show circulation coverage.
See Paragraph 3 for distribution breakdown.

For detailed description of areas on this map,
see Paragraph 1E of Audit Report.



Audit Bureau of Circulations Schaumburg, Illinois

C847-R96

1D. AVERAGE PAID CIRCULATION (BY INDIVIDUALS AND FOR DESIGNATED RECIPIENTS) IN DALLAS-FORT WORTH DESIGNATED MARKET AREA:

(Defined by Nielsen ratings company) comprising counties of Anderson, Bosque, Collin, Comanche, Cooke, Dallas, Delta, Denton, Ellis, Erath, Fannin, Freestone, Hamilton, Henderson, Hill, Hood, Hopkins, Hunt, Jack, Johnson, Kaufman, Kimble, Lamar, Navarro, Palo Pinto, Parker, Rains, Rockwall, Somervell, Tarrant, Van Zandt and Wise.

	Population	Occupied Households	Morning (Mon. to Thurs.)	Friday Morning	Saturday Morning	Sunday
1990 Census:	4,486,502	1,674,709				
#1-1-95 Estimate:	4,918,900	1,823,300				
TOTAL DESIGNATED MARKET AREA			434,095	547,376	510,440	715,508

METROPOLITAN STATISTICAL AREA: (Note - figures shown below are an optional compilation of circulation data which are included as part of the totals shown in Par. 1A).

Dallas, Texas Primary Metropolitan Statistical Area: (Counties of Collin, Dallas, Denton, Ellis, Henderson, Hunt, Kaufman and Rockwall.)

Fort Worth-Arlington, Texas Primary Metropolitan Statistical Area: (Counties of Hood, Johnson, Parker and Tarrant.)

	OCCUPIED HOUSEHOLDS		Morning (Mon. to Thurs.)	Friday Morning	Saturday Morning	Sunday
	1990 Census	#1-1-95 Estimate				
Dallas County	701,686	737,700	277,706	344,317	316,093	441,154
Remainder in Dallas, Texas PMSA	300,064	354,900	105,764	142,903	137,919	191,871
TOTAL DALLAS, TEXAS PMSA	1,001,750	1,092,600	383,470	487,220	454,012	633,025
Fort Worth-Arlington, Texas PMSA	506,281	558,800	37,962	45,532	42,060	60,507
TOTAL DALLAS-FORT WORTH, TEXAS CMSA	1,508,031	1,651,400	421,432	532,752	496,072	693,532

Population

1990 Census:

4,037,282

#1-1-95 Estimate:

4,453,100

#Market Statistics, Producers of "The Survey of Buying Power," See Par. 9(a).

1E. CITY ZONE AND BALANCE IN NEWSPAPER DESIGNATED MARKET:

CITY ZONE is the corporate limits of Dallas, plus the balance of Dallas County, in COLLIN County, cities of Allen, Plano and Richardson; in DENTON County, Flower Mound Town plus cities of Carrollton, Highland Village and Lewisville (portion west of I-35), and in ROCKWALL County, Rockwall City and the balance of Rowlett City, all in Texas.

BALANCE IN NEWSPAPER DESIGNATED MARKET comprises counties of Anderson, Collin (balance), Cooke, Delta, Denton (balance), Ellis, Fannin, Freestone, Grayson, Henderson, Hill, Hopkins, Hunt, Kaufman, Lamar, Navarro, Rains, Rockwall (balance), Tarrant and Van Zandt.

2. AVERAGE PAID CIRCULATION (BY INDIVIDUALS AND FOR DESIGNATED RECIPIENTS) IN NEWSPAPER DESIGNATED MARKET:

See Par. 1B.

AUDIT STATEMENT

There was no adjustment made in the average paid circulation as shown in the Publisher's Statements for the period audited.

This newspaper also participates in the Audit Bureau of Circulations' Coupon Distribution Verification Service. A separate report of that verification is available to all ABC members who subscribe to this service. For more information, contact ABC.

This newspaper has exercised its option to have its circulation audited by ZIP/FSA Code. A separate ZIP/FSA Code Analysis verified by ABC is available from the publisher.



Audit Bureau of Circulations

PRINTED AND RELEASED
BY ABC NOVEMBER, 1996

AUDIT REPORT:

FORT WORTH STAR-TELEGRAM (Morning & Sunday)

See Par. 11(a)

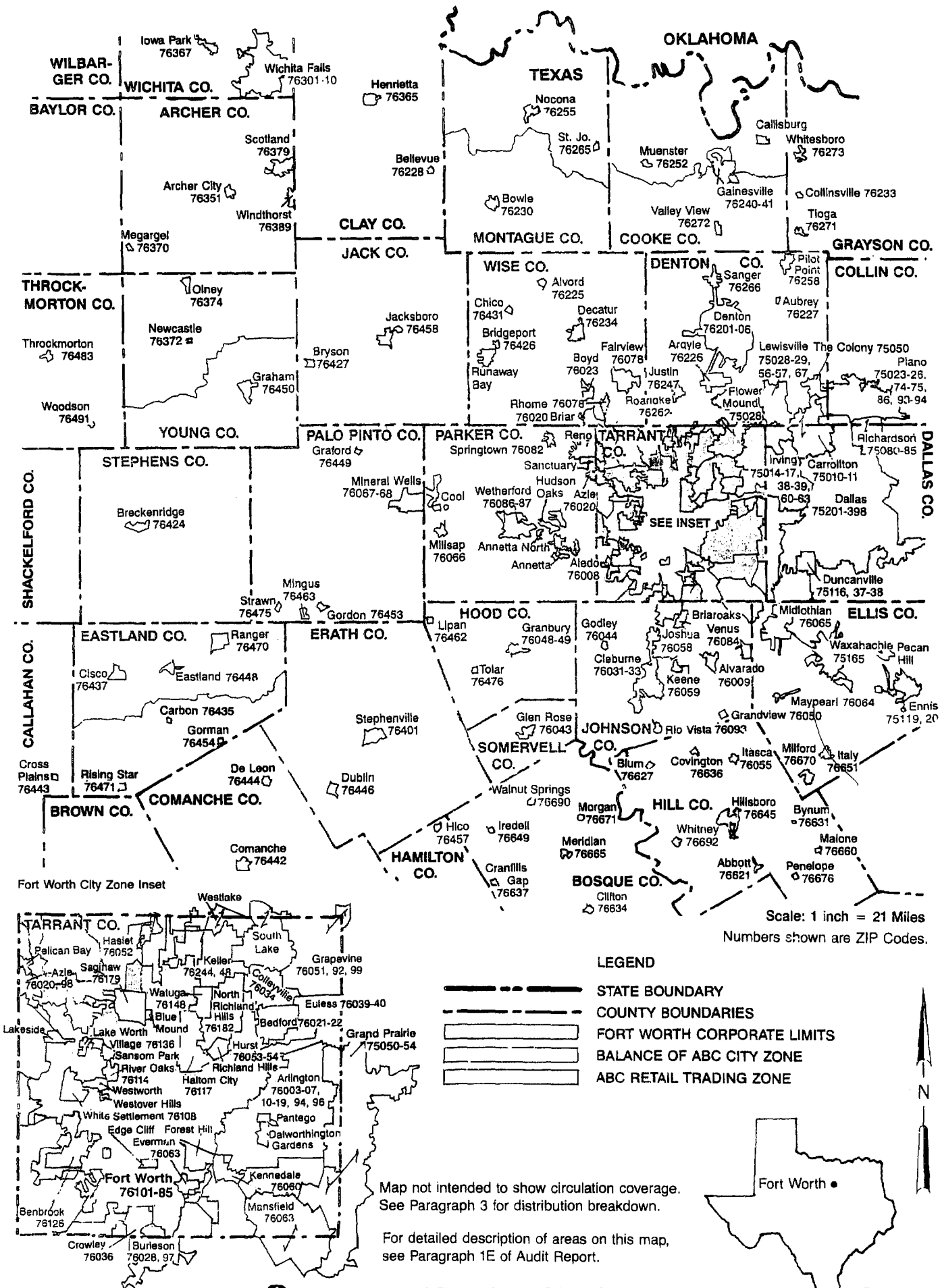
Fort Worth (Tarrant County), Texas

TOTAL AVERAGE PAID CIRCULATION FOR 12 MONTHS ENDED MARCH 31, 1996:

	Morning (Mon. to Thurs.)	Friday Morning	Saturday Morning	Sunday
1A. TOTAL AVERAGE PAID CIRCULATION (BY INDIVIDUALS AND FOR DESIGNATED RECIPIENTS):	225,253	273,878	265,923	341,893
1B. TOTAL AVERAGE PAID CIRCULATION (BY INDIVIDUALS AND FOR DESIGNATED RECIPIENTS) BY ZONES: (See Par. 1E for description of area)				
CITY ZONE				
Population	1,132,548			
Occupied Households	424,910			
1990 Census:	1,132,548			
#1-1-95 Estimate:	1,253,300			
Home Delivery				
Single Copy Sales				
Mail Subscriptions				
Newspapers in Education, See Par. 9(c)				
Employee Copies, See Par. 9(d)				
TOTAL CITY ZONE	180,902	219,769	212,621	265,651
RETAIL TRADING ZONE				
Population	670,257			
Occupied Households	247,189			
1990 Census:	670,257			
#1-1-95 Estimate:	756,200			
Single Copy Sales and Home Delivery	36,792	46,210	46,315	65,415
Mail Subscriptions	43	43	47	20
Newspapers in Education	653	260		
TOTAL RETAIL TRADING ZONE	37,488	46,513	46,362	65,435
TOTAL CITY & RETAIL TRADING ZONES	218,390	266,282	258,983	331,086
ALL OTHER				
Single Copy Sales and Home Delivery	6,162	6,897	6,322	10,143
Mail Subscriptions	605	615	617	662
Newspapers in Education	95	83		
Employee Copies	1	1	1	2
TOTAL ALL OTHER	6,863	7,596	6,940	10,807
TOTAL AVERAGE PAID CIRCULATION (BY INDIVIDUALS AND FOR DESIGNATED RECIPIENTS)	225,253	273,878	265,923	341,893
Days Omitted from Averages, See Par. 9	None of record	None of record	None of record	1
1C. THIRD PARTY (BULK) SALES				
Airlines — Available for passengers	105	106	106	106
Hospitals and Nursing Homes — Available for patients	395	398	366	342
Hotels, Motels — Available for guests	176	176	339	328
Retail/Business — Available for patrons	28	27	37	44
Other	69	79	50	15
TOTAL AVERAGE THIRD PARTY (BULK) SALES	773	786	898	835

#Market Statistics, Producers of "The Survey of Buying Power," See Par. 9(b).

CITY AND RETAIL TRADING ZONE / FORT WORTH, TEXAS



ID. METROPOLITAN STATISTICAL AREA — COUNTY OF PUBLICATION:

Fort Worth-Arlington, Texas Primary Metropolitan Statistical Area (Counties of Hood, Johnson, Parker and Tarrant)

	Occupied Households		Morning	Friday	Saturday	Sunday
	1990 Census	#1-1-95 Estimate	(Mon. to Thurs.)	Morning	Morning	
Tarrant County	438,634	485,000	186,146	226,416	219,090	274,740
Remainder in Fort Worth/ Arlington, Texas PMSA	67,647	73,800	21,052	26,899	27,024	37,687
Total Fort Worth/ Arlington, Texas PMSA	506,281	558,800	207,198	253,315	246,114	312,427
Population 1990 Census:	1,361,034	1,507,000				
#1-1-95 Estimate:						
#Market Statistics, Producers of "The Survey of Buying Power," See Par. 9(b).						

IE. CITY AND RETAIL TRADING ZONES:

CITY ZONE includes Tarrant County less the following: 1990 Census Tracts 1113.01, 1113.03, 1113.04, 1113.05, 1113.06 and 1142.03 and less portions of Tracts 1108.04, 1110.08, 1110.10, 1114.01, 1114.03, 1115.18, 1115.19, 1139.02, 1141.01 and 1142.02.

(CITY ZONE includes the incorporated cities of Fort Worth, Arlington, Azle, Bedford, Benbrook, Blue Mound, Burleson, Colleyville, Crowley, Dalworthington Gardens, Euless, Everman, Forest Hill, Grand Prairie, Grapevine, Haltom City, Hurst, Keller, Kennedale, Lakeside, Lake Worth, North Richland Hills, Richland Hills, River Oaks, Saginaw, Sansom Park, Southlake, Watauga, Westover Hills and White Settlement, Pantego Town, and villages of Edgecliff and Westworth.)

RETAIL TRADING ZONE includes, with exception of City Zone, counties of Denton, Erath, Hood, Jack, Johnson, Palo Pinto, Parker, Somervell, Stephens, Tarrant and Wise; and in COOKE County, Census County Divisions of Gainesville, Gainesville Southeast and Valley View; in EASTLAND County, divisions of Cisco, Eastland and Ranger; in MONTAGUE County, divisions of Bowie and Montague-Forestburg; and in YOUNG County, Graham Division.

2. AVERAGE PAID CIRCULATION (BY INDIVIDUALS AND FOR DESIGNATED RECIPIENTS) IN NEWSPAPER DESIGNATED MARKET:

Answer optional and not made.

AUDIT STATEMENT

There was no adjustment made in the average paid circulation as shown in the Publisher's Statements for the period audited.

This newspaper also participates in the Audit Bureau of Circulations' Coupon Distribution Verification Service. A separate report of that verification is available to all ABC members who subscribe to this service. For more information, contact ABC.

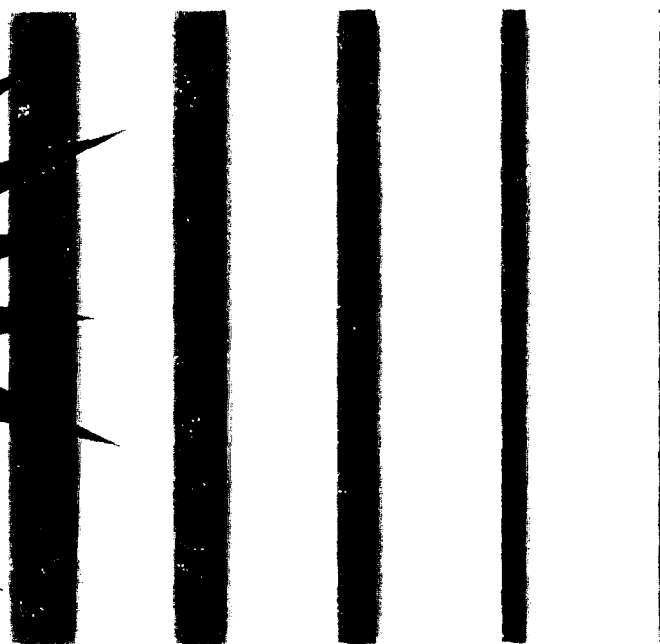
This newspaper has exercised its option to have its circulation audited by ZIP/FSA Code. A separate ZIP/FSA Code Analysis verified by ABC is available from the publisher.

PERCENTAGE OF TOTAL PAID AND HOUSEHOLD COVERAGE PERCENT:

	Occupied Households (1-1-95 Est.)	Morning (Mon. to Thurs.)			Total Paid	Friday Morning			Total Paid	Saturday Morning			Total Paid	Sunday		
		Total Paid	% of Total Paid	Household Coverage		Total Paid	% of Total Paid	Household Coverage		Total Paid	% of Total Paid	Household Coverage		Total Paid	% of Total Paid	Household Coverage
City Zone	468,900	180,902	80.31	38.58%	219,769	80.24	46.87%	212,621	79.96	45.34%	265,651	77.70	56.65%			
Retail Trading Zone	278,100	37,488	16.64	13.48%	46,513	16.98	16.73%	46,362	17.43	16.67%	65,435	19.14	23.53%			
Total City & Retail Trading Zones	747,000	218,390	96.95	29.24%	266,282	97.22	35.65%	258,983	97.39	34.67%	331,086	96.84	44.32%			
All Other		6,863	3.05		7,596	2.78		6,942	2.61		10,807	3.16				
TOTAL PAID		225,253	100.00%		273,878	100.00%		265,925	100.00%		341,893	100.00%				

70%

based on Fall 1993 targets



Radio Market Report

Dallas-Ft. Worth



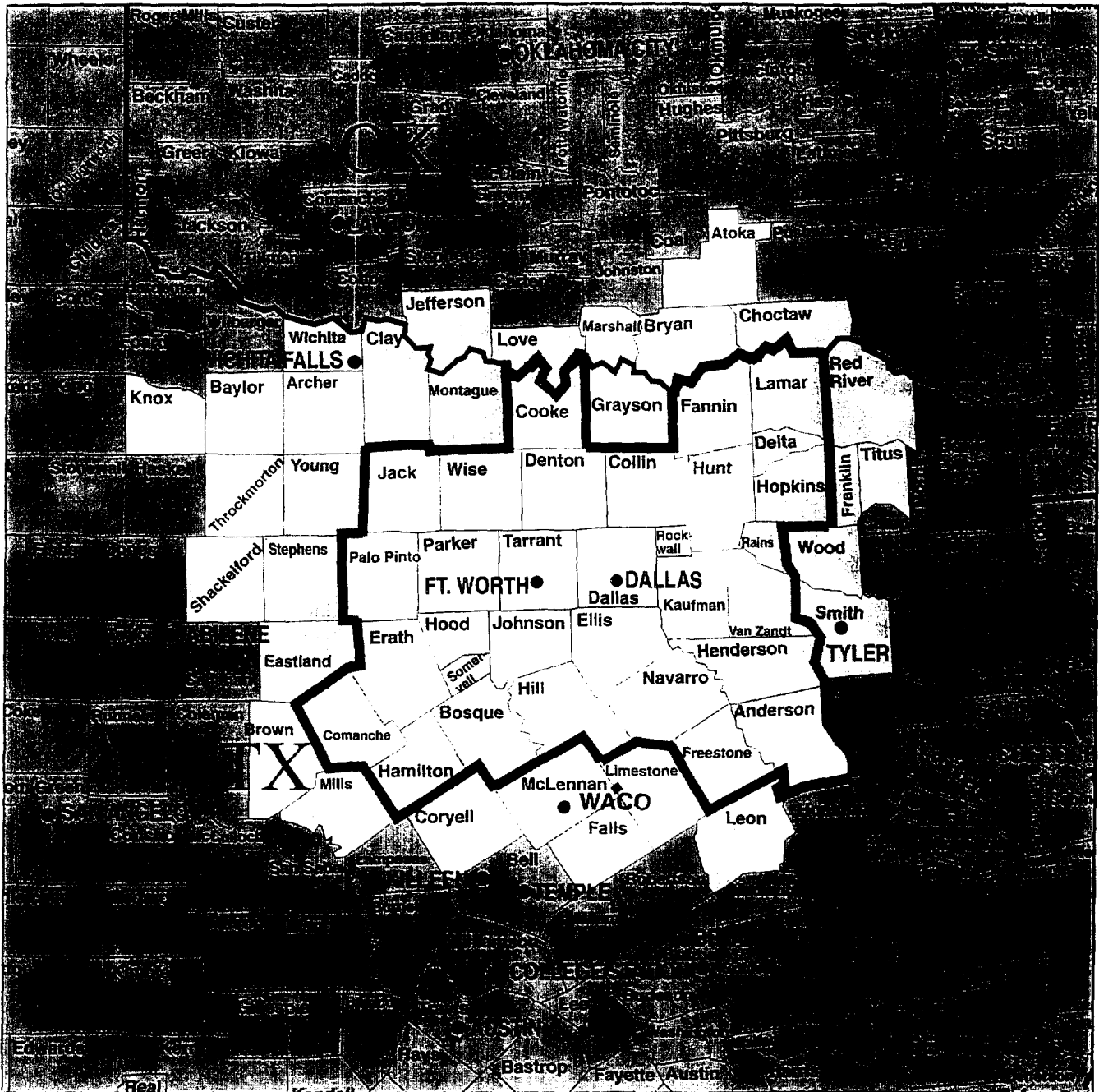
Accredited by
Electronic Media
Rating Council®

22 Dallas-Ft. Worth
Summer 1996

ARBITRON

Summer 1996
June 27 - September 18

Dallas-Ft. Worth



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☐ Metro ☐ TSA ☐ DMA®

TSA and DMA sampled in Spring and Fall only.
For definitions of the terms Metro, TSA and DMA, see Page M3, Paragraph 1, and Page M7, "Selected Arbitron Terms."

Metro Rank: 7

Market Surveyed: Winter, Spring, Summer, Fall

Station Subscribers to This Report*

KDGE-FM	KDMM-AM	KDMX-FM	KEGL-FM	KESS-AM	KEWS-FM
KHCK-FM	KHKS-FM	KHVN-AM	KIQI-FM	KKDA-AM	KKDA-FM
KLIF-AM	KLUV-FM	KMRT-AM	KMRT-FM	KOAI-FM	KPLX-FM
KRBV-FM	KRLD-AM	KRRW-FM	KSCS-FM	KTCK-AM	KTXQ-FM
KVIL-FM	KYNG-FM	KZPS-FM	WBAP-AM		

* Station subscribers as of release to print.

ARBITRON

Description of Methodology

Introduction

The following Description of Methodology is applicable to the data and estimates contained in the "Listener Estimates" section of this report. A more detailed description of Arbitron methodology can be found in a separate publication titled *Arbitron Radio Description of Methodology* and in other associated relevant documents, made available by Arbitron to all Arbitron syndicated Radio Report subscribers. In the event that the separate publication titled *Arbitron Radio Description of Methodology* conflicts with the "Description of Methodology" printed herein, the latter is considered the more current Description of Methodology.

The Market

1. The Market/An Arbitron Radio Market can be composed of up to three geographic areas: the Metro Survey Area (Metro), the Total Survey Area (TSA) and the Designated Market Area (DMA®). These areas are composed of sampling units. A sampling unit generally consists of a single county, but may also consist of an independent city or a split county. Split counties are defined as one or more zip codes within a county and are based on zip code information from 1990 Census data, as updated annually by Market Statistics.

a. Metro Survey Area (Metro)

Arbitron Radio Metros generally correspond to the federal government's Office of Management and Budget's (OMB) Metropolitan Areas. A radio Metro may deviate from its respective OMB definition due to topographical, sampling, or other considerations.

For areas that do not have an OMB-defined Metropolitan Area, Arbitron usually defines the Metro Survey Area to include the county(ies) of the majority of the local area stations' city(ies) of license.

The OMB updates its Metropolitan Areas every 10 years, based on the new decennial census data. At that time, Arbitron reviews all Radio Metro definitions for possible adoption of the applicable OMB definitions. In the review process, Arbitron considers such factors as: the historical market definition(s), local trade and commuting patterns, local radio listening patterns, and input from its subscribers.

Changes to an existing Metro definition between the 10-year OMB review cycles will be considered by Arbitron if a formal written proposal, which presents in detail the rationale and benefits of the proposed Metro, is submitted to Arbitron within established deadlines; widespread subscriber support for the change is generally required as well.

b. Total Survey Area (TSA)

The TSA of an Arbitron Radio Market is designed to provide a comprehensive measure of listening to Metro-licensed radio stations. The TSA is composed of the Metro and any additional counties (or geographically split counties) which meet certain criteria for inclusion.

TSA definitions are based on historical radio listening patterns and are updated biennially based on the syndicated diary data used for the most recent County Coverage study [excluding any extra sample used for Custom Survey Area Reports (CSARs)]. The specific criteria for adding, retaining or deleting non-Metro TSA counties are outlined in a separate publication titled *Arbitron Radio Description of Methodology* and in other associated relevant documents.

c. Designated Market Area (DMA®)

The DMA is composed of sampling units (counties or geographically split counties) and is defined and updated annually by the A.C. Nielsen Company, based on historical television viewing patterns. A county or split county is assigned exclusively to one DMA.

Arbitron reports radio listening estimates for the Top 50 DMAs (ranked on TV households) in the Radio Market Reports of all Arbitron standard radio markets whose Metros are located within the DMA and whose names are contained in the DMA name.

Sampling & Measurement Techniques

2. Sampling Methodology/Survey sample targets are established for the Metro and, if applicable, the non-Metro TSA and/or the DMA. Sample targets are then established for each sampling unit proportional to its Persons 12+ population in the respective survey area subject to minimum sample requirements for Radio County Coverage. The amount of sample ordered is determined by dividing the sampling unit target by the expected rate of response based on previous survey(s) sample performance and other factors.

For each 12-week survey period, a new sample of telephone numbers is computer-selected for each sampling unit through the use of a systematic interval random selection technique. Listed and unlisted telephone numbers are randomly generated using the random digit dial (RDD) technique. Sample RDD numbers are generated from telephone "hundred blocks" containing at least 10 listed residential telephone numbers based on current telephone listings as provided and updated by Metromail Corporation. These qualifying hundred blocks comprise the sample frame for each sampling unit. Known non-residential telephone numbers (e.g., businesses, institutions) are excluded from the sample frame. The sample of telephone numbers is then randomly divided into approximately equal weekly groups for diary placement calling.

If a need for additional sample arises after the original sample has been selected by the computer, then such additional sample is generally selected in the same manner and from the same sample frame as the original sample.

3. Arbitron Radio Listening Diary/Arbitron uses 7-day individual diaries to gather listening information from persons 12 years of age and older (Persons 12+). Bilingual (Spanish-English) diaries are provided to all survey participants in the Metro of a Hispanic-controlled market who have identified themselves as Hispanic in response to an ethnicity question or from whom ethnic information was not obtained, and to any others indicating a preference for a bilingual diary. Premiums of varying monetary amounts are provided to encourage respondent cooperation. Arbitron sends a diary for each Person 12+ reported in the sample household up to a maximum of nine diaries.

4. Diary Placement and Retrieval/Initial contact with listed sample households is by mail, informing them of their selection and that an interviewer will be calling to request their cooperation in the survey. Initial contact with unlisted sample households is by telephone, when an interviewer calls to request participation in the survey.

Arbitron interviewers call selected telephone numbers to ascertain the possibility of a media affiliation, to gain consent for participation in the

survey, to determine the number of Persons 12+ living in the household at the time of the placement call and, where applicable, to determine the race/ethnicity and demographics of the household. Households with more than nine persons 12 years of age and older and media-affiliated households are ineligible for survey participation.

Interviewers are instructed to make a number of attempts to reach every telephone number in the sample. These attempts are made at different hours of the day and evening. Arbitron then sends diaries directly to consenting sample households.

In addition to follow-up by mail from Arbitron, the interviewers are directed to make further contact(s) with consenting sample households by telephone: to make sure the diaries have been received; to assist members of the household in understanding the diaries' purpose; to answer any questions; to remind the diarykeepers to return their diaries after the survey week; and to thank them for their participation in the survey.

Explicit instructions are provided to each interviewer, and validation checks are regularly conducted to help ensure that instructions are being properly followed.

Processing Techniques

5. Processing of Diaries/Arbitron makes reasonable efforts to utilize all returned diaries. However, some returned diaries are determined by Arbitron to be unusable. Among those which are unusable are diaries which Arbitron determines: are incomplete; are postmarked and/or arrive before or after established dates; or which otherwise lack essential information. The total number of in-tab diaries may differ from the sample target.

Usable diaries are prepared for computer processing in accordance with procedures listed in the *Arbitron Radio Edit Procedures Manual*. The listening information in the diaries is then computer-entered so that certain verifications and edits can be made. These include ascription procedures, the allocation of credit for aberrated call letters and other analyses and pretabulation preparations.

Calculating Techniques

6. Calculation of Estimates/

a. Sample Balancing

The weighting system used by Arbitron, sample balancing, is an iterative marginal weighting technique designed to compensate for disproportionate in-tab from specified marginal classes. Marginal weighting means that in-tab diaries are weighted to represent the population for each specified marginal class. The number of geographic marginal classes (i.e., counties, split counties or county clusters) will vary. The number of sex/age marginal classes is generally 16. In addition, markets that are race and/or ethnically controlled are sample balanced so that in-tab diaries from the race/ethnic group are weighted to represent the population of that race/ethnic group. As a result of this cumulative weighting, a Persons-Per-Diary Value (PPDV) is computed for each in-tab diary. The PPDV is the number of persons that diary is estimated to represent.

b. Computing Cume Persons Estimates

Station Cume Persons estimates are computed by summing the PPDVs for each diary in which a station received listening credit for the time the station is on the air within a daypart. PPDVs are

Selected Arbitron Terms

Average Quarter-Hour Persons/The estimated number of persons who listened to a station for a minimum of five minutes within a quarter-hour. The estimate is the average of the reported listening in the total number of quarter-hours the station was on the air during a reported daypart. This estimate, expressed in hundreds (00), is reported for the Metro, TSA and, where applicable, the DMA.

Average Quarter-Hour Rating/The Average Quarter-Hour Persons estimate expressed as a percentage of the appropriate estimated population. This estimate is reported for the Metro and, where applicable, the DMA.

Average Quarter-Hour Share/The Average Quarter-Hour Persons estimate for a given station expressed as a percentage of the Metro Total Average Quarter-Hour Persons estimate within a reported daypart. This estimate is reported for the Metro only.

Cume Duplication/The percentage of estimated Cume Persons for one station that also listened to a second station. This estimate is reported for the Metro only.

Cume Persons/The estimated number of different persons who listened to a station for a minimum of five minutes in a quarter-hour within a reported daypart. (Cume estimates may also be referred to as *cumulative* or *unduplicated* estimates.) This estimate, expressed in hundreds (00), is reported for the Metro, TSA and, where applicable, the DMA.

Cume Rating/The estimated number of Cume Persons expressed as a percentage of the appropriate estimated population. This estimate is reported for the Metro only.

Daypart/A time period for which audience estimates are reported (e.g., Monday-Friday, 6AM-10AM; Weekend 6AM-Midnight).

Designated Market Area (DMA®)/A.C. Nielsen's geographic market design which defines each television market exclusive of others based on measurable viewing patterns. Every county or sampling unit in the United States is assigned exclusively to one DMA®.

Designated Sample/Telephone numbers selected from the sample frame for this survey determined by Arbitron to be usable.

Diary Mentions/The number of in-tab diaries in which listening to a station has been recorded for at least five minutes in a quarter-hour within a given daypart.

Diarykeeper/Any individual that Arbitron determines to be eligible to receive and who is sent survey materials.

Effective Sample Base (ESB)/The theoretical sample size to be used for estimating the sampling error of audience estimates. (See Page M5, Par. 15.)

Ethnic Composition/Audience estimates for Total, Black and/or Hispanic persons expressed in hundreds (00), ratings and composition percents. Ethnic composition estimates are based on total Metro in-tab diaries and are reported for the Metro of ethnically controlled markets only if at least 30 Black and/or 30 Hispanic diaries, as appropriate, are in-tab from the Metro.

Exclusive Cume Audience/The estimated number of Cume Persons who listened to only one selected station within a reported daypart. This estimate is shown for the Metro only.

Group Quarters/For sampling purposes, Arbitron defines group quarters as residences of 10 or more unrelated individuals. However, living arrangements such as college housing units, military barracks, nursing homes, etc., are considered eligible residences if the telephone number is assigned to a private telephone serving fewer than 10 individuals.

High-Density Area (HDA)/A High-Density Area is a zip code-defined sampling unit which may be established in a county within the Metro of an ethnically controlled market. The specific criteria for establishing, retaining, or eliminating an HDA are outlined in a separate publication titled *Arbitron Radio Description of Methodology*.

In-Tab Sample/The number of usable diaries tabulated in producing the report.

Listening Locations/Locations for which audience estimates are reported (At Home, In Car, At Work, Other).

Metro Survey Area (Metro)/Metro Survey Area definitions generally correspond to the federal government's Office of Management and Budget's (OMB) Metropolitan Statistical Areas, Primary Metropolitan Statistical Areas or Consolidated Metropolitan Statistical Areas, subject to exceptions dictated by historical industry usage or other marketing considerations as determined by Arbitron.

Metro Totals and/or DMA Totals (*Total listening in the Metro and/or Total listening in the DMA*)/The Metro and/or DMA Total estimates include estimates of listening to reported stations, as well as to commercial stations that did not meet the Minimum Reporting Standards, plus estimates of listening to noncommercial and unidentified stations.

Minimum Reporting Standards (MRS)/Criteria used to determine which stations qualify to be listed in this report. (See Page M4, Pars. 8-9.)

Persons-Per-Diary Value (PPDV)/The numerical value assigned to each in-tab diary for the process of projecting audience estimates to the entire 12+ population in a market. The PPDV reflects the number of persons in the geographic/sex/age/ethnic (if applicable) group represented by each in-tab diary after sample balancing has been performed.

Rating/(See Average Quarter-Hour Rating and Cume Rating.)

Sample Frame/The universe from which eligible diarykeepers are randomly selected. The sample frame for Arbitron radio surveys is designed to sample households with telephones.

Sample Target/The number of diaries that is the objective for in-tab sample size.

Sampling Unit/A geographic area consisting of a county or split county. (See Page M3, Par. 1.)

Share/(See Average Quarter-Hour Share.)

Simulcast/The simultaneous broadcast of one station's total and uninterrupted broadcast flow by a second station without any variation except if the two simulcast stations choose to separately identify their call letters, frequency, station name and/or city of license, if appropriate, at the same time.

Split County/A portion of a county composed of one or more zip codes which has been separately identified for purposes of ordering and controlling sample.

Technical Difficulty (TD)/Time period(s) of five or more consecutive minutes during the survey period for which a station listed in this report notified Arbitron in writing of: reduced power; intermittent power; signal interference; or times the station was off the air within the station's authorized broadcast day.

Time Spent Listening (TSL)/An estimate of the amount of time the average person spent listening to radio or to a station during a specific daypart expressed in hours and minutes. This estimate is reported for the Metro only.

Total Survey Area (TSA)/A geographic area that includes the Metro Survey Area and may include additional counties.

APPENDIX C

**An Empirical Investigation of the Scope of Competition
Among Newspaper, Radio, Television and Other Advertising Media**

Economists Incorporated

An Empirical Investigation of the Scope of Competition Among Newspaper, Radio, Television and Other Advertising Media

Economists Incorporated
February 1996

Introduction and Summary

An important issue raised by the Commission in this Notice of Inquiry¹ is the effect of a change in cross-ownership policies on competition. Such a change could permit joint ownership of newspapers and radio stations where such ownership is now prohibited. The best way to assess the competitive effects of any proposed joint ownership is to examine the facts specific to the market or markets in which the acquired and acquiring parties operate. As a general model, the Commission can use the fact-specific, case-by-case investigations undertaken by the Department of Justice and Federal Trade Commission when reviewing proposed mergers. The *Horizontal Merger Guidelines*² which guide these agencies in such investigations is a suitable framework for considering questions of market definition and competitive impact in advertising markets.

Due to the importance of local facts and conditions, this paper does not attempt to provide a competitive analysis for each "relevant" media market. Even if time and resources permitted such an endeavor, it would be impossible because there are at least as many "relevant markets" as there are potential cross-ownership transactions. Nevertheless, some generalizations can be

¹ Notice of Inquiry (NOI), In the Matter of Newspaper/Radio Cross-Ownership Waiver Policy, MM Docket No. 96-197, released October 1, 1996.

² Department of Justice and Federal Trade Commission Horizontal Merger Guidelines, Federal Register, Vol. 57, No. 176, September 10, 1992.

made. This paper uses information from a number of market areas to offer guidance on the direction that analyses undertaken in specific markets are likely to lead. This paper presents empirical findings which support a presumption that should serve as the starting point for the FCC when it investigates individual transactions on a case-by-case basis. This presumption with respect to product markets is that a properly-defined local advertising market generally will include not only newspaper, radio and television media but other sellers of advertising as well.

As explained in the *Merger Guidelines*, an important step in evaluating the competitive effect of a merger is determining the relevant product market. Starting from the point of view of customers for whom the merging media are good substitutes, the relevant product market should include all the products which a hypothetical monopolist must control in order to profitably raise price to those customers.³ Economists are in general agreement that the higher the concentration of ownership in a relevant market, the greater the likelihood that anticompetitive behavior will occur. Anticompetitive behavior can be manifest in higher advertising prices. Persistently higher prices due to reduced competition should also lead to higher profits for sellers in the market, other things equal, which can be expected to translate into higher sale prices when such firms are sold. Whether or not advertising prices are above competitive levels at the time a station is sold, a buyer should be willing to pay more for a station in a more concentrated market, other things equal.

The geographic scope of the market in which local newspapers and radio stations compete depends upon the extent to which advertisers that utilize the two media seek to reach a common area. As a general matter there are strong reasons to respect the areas drawn by audience ratings services, which reflect the commonly accepted geographic structure of broadcast markets. Arbitron Metro Markets generally reflect the area of overlap between radio stations and the corresponding circulation measures for many central city

³ Horizontal Merger Guidelines, § 1.11.

newspapers. Thus, in many cases—for example, where cross-ownership is proposed for a central-city daily newspaper and a central-city radio station—the Arbitron Metro Market area would seem an appropriate geographic market definition. Even where the cross-ownership would link a central-city station with a suburban newspaper, the larger Metro Area may remain appropriate. Although suburban newspapers cannot by themselves deliver the same audience as a central-city broadcast station, they can form part of a package or group buy that does constitute such a substitute. In other—presumably rare—cases (e.g., a merger between a daily newspaper that is published and circulates in a small outlying (non-metro) community and a station licensed to the same community, a market limited to that city (or its county) might be appropriate.

The analysis in this paper takes as given the existence of a relationship between increased concentration in a relevant market and higher product prices, firm profits and firm valuations. (If this assumption is not valid then much of U.S. merger law lacks economic foundation.) Given this assumption, if one finds in any particular candidate “market” that there is no relationship between concentration and the value of the media concerns, one must conclude that the “relevant market” has not been properly defined. Thus, concentration and value-of-firm information can be used to help define the scope of the relevant market. The core analysis in this paper uses econometric analysis to test whether, over a number of sample media markets, various geographic and product market definitions “make sense” in terms of the relationship between concentration and market performance.

Radio station sales prices are examined first in a candidate market defined to include radio stations and daily newspapers. Narrower markets, comprising only radio stations or only newspapers, are not analyzed because if the relevant product market for radio/newspaper combinations does not include both media, there can be no competitive effect from eliminating the cross-ownership restrictions. The empirical analysis shows that concentration (measured by the HHI) in a radio-newspaper market is not statistically

related to radio station sale prices.⁴ This finding suggests strongly that the proper relevant product market is broader than this pair of media.

The next step in the analysis is to examine a broader candidate market consisting of radio, newspapers, and TV. Even in this broader market, however, concentration is not related to the prices at which radio stations are sold. The absence of any statistically significant relationship is evidence that a market restricted to these three media is too narrow, and that the proper relevant product market includes other competing sellers of advertising such as direct mail and outdoor advertising.

The analysis of radio station sale prices is reinforced by an analysis of TV station sale prices. TV station sale prices are examined first in a candidate market defined to include TV stations and newspapers, then in a market including TV stations, newspapers and radio stations. As in the radio station analysis, TV station sale prices are not statistically related to concentration in either candidate market. This supports the finding that other media significantly compete with radio, newspaper, and TV.

Competitive analysis also requires the definition of a relevant geographic market. This paper does not focus on identifying a single correct definition of the geographic market. Instead, it examines the product market question in the context of three alternative geographic markets which the Commission might consider. For obvious reasons, public data on audiences are based on certain industry-standard geographic definitions. It is difficult to find data for geographic areas defined in other ways. Industry-standard geographic markets are far from arbitrary. Indeed, they should serve as an obvious focal point for competitive analysis because they are areas that the rating services have found most valuable to their customers—advertisers and broadcasters. Since what broadcast media are measurably selling, and advertisers are measurably buying, from a geographic perspective is a DMA

⁴ The Herfindahl-Hirschman Index (HHI) is often used to measure market concentration. It is calculated as the sum of the squares of market shares of individual participants.

or some other industry-standard area, it makes sense to focus on such areas when considering the effects of media combinations.

The first of the three geographic markets considered here is the DMA (Designated Market Area), commonly used as a proxy for the area reached by TV stations and the principal geographic area for which Nielsen produces TV audience information. The second geographic market, the Arbitron Metro Market, is the principal geographic area used by Arbitron in producing radio audience information. The third geographic market is based on the current cross-ownership rule, which focuses on the community in which a newspaper is published and the radio and TV stations with contours that encompass it. Each of the product markets described above was tested with each of these alternative geographic market definitions. Regardless of the geographic market, the statistical analysis supports the inference of a product market broader than radio, newspaper, and TV.

Figure 1 summarizes the combinations of candidate product markets and geographic markets investigated.

Figure 1: Summary of Candidate Product and Geographic Markets

	DMA	Arbitron	Community
Radio-Newspaper	X	X	X
TV-Newspaper	X	X	X
Radio-Newspaper-TV	X	X	X

Data and Procedures

The key indicator of the competitiveness of individual markets used in this analysis is radio and TV station sale price. This indicator should vary with concentration in a properly defined relevant market. Station sale prices were obtained from BIA's MasterAccess databases. To avoid complications arising from partial ownership, valuation of debt and multiple station sales, only

station sales completed in 1995 for which cash was paid for the entire assets of an individual station were included.

The most data-intensive part of the analysis was calculating HHIs for all the different candidate market combinations considered. In order to economize on this effort, the sample was drawn to minimize the number of HHIs to be calculated. Accordingly, the initial sample included 13 market areas in which both one or more radio stations and one or more TV stations were sold during 1995. Additional market areas in which either a radio or TV station was sold were added to the sample to make a total of 38 radio station sales and 31 TV station sales in 35 distinct market areas.⁵

For each product market and geographic market considered, the HHI was calculated based on 1995 revenues attributable to each station or newspaper owner in the market. BIA was the source for radio and TV station revenues. Revenue estimates were not available for some radio and TV stations. These were not incorporated in the HHI calculation, but they are thought to be chiefly small stations whose omission would not affect the HHI substantially. Newspaper advertising revenues were estimated in *Duncan's Radio Market Guide* for the principal metropolitan daily newspapers.⁶ Revenue estimates for other daily and weekly newspapers, including suburban newspapers, were not available and so were not incorporated in the HHI calculation; the effect is to overstate HHIs.

To account for this possible measurement error in the HHI calculations, each of the regressions discussed below was estimated using two methods. The first method was the standard OLS approach. In the second method, an

⁵ The analysis of smaller markets can be complicated in individual cases by stations in large neighboring markets. To avoid this complication, radio station sales in markets smaller than the top 100 Arbitron and TV station sales in markets smaller than the top 100 DMAs were not included in the sample.

⁶ This estimate includes retail, insert and "retail classified" (e.g., auto and real estate) advertising but excludes advertising typically placed by individuals (e.g., personals).